

Washington State  
Citizens Committee on Pipeline Safety  
PO Box 47250  
Olympia, WA 98504-7250

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November 22, 2002

Dear American Petroleum Institute:

**Subject:     Comments to Draft Recommended Practice 1162**

We appreciate this opportunity to comment on your draft Recommended Practice on public awareness programs. Clearly, the American Petroleum Institute and the American National Standards Institute have put in a lot of work in crafting a valuable set of guidelines.

As a general comment, we believe the guideline should not limit itself to the mandates found in 49 CFR Parts 192.616 and 195.440. The public sees little distinction between "public awareness" as defined by federal rules and "community right to know." Nor should the guidelines ignore how public awareness can be emphasized during construction and grave emergency situations. The messages conveyed during pipeline siting or after an emergency carry great weight in whether future public awareness messages are to be effective. To establish minimum guidelines without keeping in mind all these other communications needs lessens the effectiveness of the communications that do occur.

The draft RP recognizes the importance of public information plans that are tailored to a particular region, facility and set of publics. We are concerned, however, that there is little guidance on how an operator determines how to tailor its message and delivery to the public. Specifically, the guidelines call on the operator to establish methods to verify the effectiveness of the message after the fact but do not require the operator to survey its target audiences to determine the best messages and delivery mechanisms up front. It is generally standard practice to study your audience in advance of developing and implementing a communications plan--such research not only contributes to the design of the plan but also establishes a baseline by which to measure its effectiveness.

We recommend that the guidelines include a research process by which the operator determines what kind of information its targeted audiences wish to receive and in what form.

We would offer the following specific comments for your consideration:

- 1) Section 2.1 Objectives - Public awareness of pipelines should include not only the message of a pipeline's presence in a locality and its role in transporting energy products, it should also include information about what operators have done and continue to do to manage the integrity of this asset over time. What is the operational history of this pipeline? What is being done now that ensures the public's safety and the pipeline's integrity? For liquid pipeline operators here is an opportunity to inform the public of what the operator is doing to comply with 49 CFR Part 195.452 - Integrity Management.

In addition to the objectives found under section 2.1.1, we suggest the following for each audience listed:

- *The Affected Public:*  
Create an ongoing dialogue with local populations.  
Describe what the pipeline operator does to assure pipeline integrity.
- *Local Public Officials:*  
Describe what integrity management practices are and how these affect local governments, such as through permits.
- *Emergency Officials:*  
Describe how often an operator conducts tabletop exercises.  
Describe who is involved in the operator's incident command structure.

Finally, in the last paragraph of this section, the RP says: "The general public is a larger audience for general pipeline awareness information, but is not normally included specifically or directly for receipt of information from pipeline operators." If we interpret this correctly, it is exactly the point that we would take issue with. The general public has a stake in pipeline safety and should be considered by operators as an explicitly important recipient of awareness information.

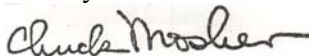
- 2) Section 4.2, Pipeline Maintenance Activities - The term "major maintenance construction projects" needs to be defined. Major construction and intrusion into a citizen's property and life is certainly going to be defined differently from the public's point of view than

it is the operators'. "Major" to one operator may be "routine" to another. The RP should caution operators that any construction activity may be viewed as major, especially if it impacts the public's access to certain areas or roadways. In addition to notification of emergency and local public officials, operators need to consider the commuting public and local neighbors who might be affected by such projects. In addition, acquisition of permits will not serve to notify all the local officials that may have a need for information about construction projects. Local public works officials should not be expected to notify all the proper individuals within a local government that have a need to know, about pipeline maintenance or construction. Operators need to inform the public about these permits, as well as franchises entered into with public entities.

Finally, we would argue that the minimum frequency for delivery of materials to residential audiences should be one-year, not two. Our experience is that residential communities turn over frequently. Also, the nature of this information is such that we doubt that pipeline awareness is enhanced by every other year communication.

We applaud the Institute in its work to compile a comprehensive guide on public awareness. Your work thoroughly outlines what the industry might wish to convey to the public. But it stops short of establishing guidelines that would lead to a comprehensive public awareness plan.

Sincerely,

A handwritten signature in black ink that reads "Chuck Mosher". The signature is written in a cursive, slightly slanted style.

Chuck Mosher, Chair  
Washington Citizens Committee on Pipeline Safety